

# SEPPINNI LLP

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January 12, 2023

The Honorable Ronnie Abrams, U.S.D.J.  
United States District Court  
Southern District of New York  
Thurgood Marshall  
40 Foley Square  
New York, NY 10007

**Re: McConaughey v. The Port Authority of New York and New Jersey, re Discovery Deadline**  
Civil Action No. 1:21-cv-06137-RA

Dear Honorable Judge Abrams,

I represent Plaintiff Michael McConaughey in the above-referenced matter and submit this joint letter on behalf of the Parties.

As of January 12, 2023, the Parties have conducted all 11 fact witness depositions in this matter. Due to factors beyond the Parties' control that cannot be shared on the public docket, but can be disclosed *in camera*, we are unable to facilitate the final exchanges of documents in this case by the current January 13, 2022, deadline. The Parties require until the end of February 2023 to do so.

As a result, the Parties request a discovery extension until March 1, 2023, so that they can gather and exchange these documents. The close of fact discovery would therefore be March 1, 2023, and the close of expert discovery would be March 23, 2023.

Thank you for your consideration of this joint request.

Regards,

/s/ Shane Seppinni

Shane Seppinni

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Application granted. The post-fact discovery conference is adjourned until April 7, 2023 at 3:30 p.m. The parties' letter shall be submitted a week in advance of the conference.

SO ORDERED.



Hon. Ronnie Abrams  
1/13/2023